



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
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October 16, 2020

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*,
No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I write respectfully on behalf of the United States Department of Homeland Security, Customs and Border Protection, Immigration and Customs Enforcement, Citizenship and Immigration Services, Department of Justice, and Department of State, defendants in the above-referenced FOIA action, regarding the joint status update that the parties proposed to submit today, October 16, 2020, *see* Dkt. No. 156, to respectfully request until October 20, 2020, to submit such a joint status update. Plaintiff consents to this request.

As the Court is aware, these agencies agreed to conduct a search for documents responsive to Item Number 1 in plaintiff's FOIA Request, and the agencies have either completed or will soon complete searching, processing and producing responsive documents, if any. In addition, on September 13, 2020, the Court issued an order denying the government's motion for reconsideration as to the September 13, 2019, and September 23, 2019, Orders, *see* Dkt. No. 158, and the agencies are currently evaluating next steps. In light of the number of agencies involved, the Government respectfully requests until Tuesday, October 20, 2020, to review, comment on, and finalize and submit the joint status report.

I thank the Court for considering this matter.

Respectfully,

AUDREY STRAUSS
Acting United States Attorney

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cc: Counsel for Plaintiff (by ECF)